From:	Kelly Wright
To:	Rob Hartman; Weigel, Greg
Cc:	susanh@ida.net; brian.english@deq.idaho.gov; Al Lam; Ex. 6 ; vannoyj@dhw.idaho.gov; Williams, Jonathan; Marguerite Carpenter; Valdez, Heather; Ex. 6 ; rachel.greengas@fmc.com; Ross, Carrie
Subject:	RE: RCRA Pond UAO Weekly Report #300 - May 2 to 8, 2016
Date:	Tuesday, May 24, 2016 7:43:09 AM

In reviewing this email, it was noted that the carbon over heated with a down time of approximately 4 hours. Have the following questions to ask:

- What caused the carbon to overheat?
- What were the indications that the carbon overheated?
- Was it caused by a buildup of phosphine inside the canister?
- Was the carbon older?
- Were any pictures taken documenting the fact that the carbon was overheated?
- Based on the measurements provided from units at Pond 16S, the east pipe had one measure of 0.12 ppm but according to the average concentrations listed, it was over 6,000 ppm?
- Can we see the data collected up until the point it shut down and once the unit was restarted?

Thanks for your assistance with this information.
Kelly

From: Rob Hartman [mailto:Rob.J.Hartman@mwhglobal.com]
Sent: Wednesday, May 11, 2016 3:59 PM
To: Greg Weigel <Weigel.Greg@epamail.epa.gov>
Cc: Kelly Wright <kwright@sbtribes.com>; Susan Hanson <susanh@ida.net>; 'Brian.English@deq.idaho.gov' <Brian.English@deq.idaho.gov>; Al Lam <lam@ae-eng.com>; Ex. 6 Vannoy, Jim A. - CO 6th <VannoyJ@dhw.idaho.gov>; Williams, Jonathan <Williams.Jonathan@epa.gov>; Marguerite Carpenter <MARGUERITE.CARPENTER@fmc.com>; Valdez.Heather@epa.gov; Ex. 6 rachel.greengas@fmc.com; Ross, Carrie <Carrie.Ross@parsons.com>
Subject: RCRA Pond UAO Weekly Report #300 - May 2 to 8, 2016

Greg,

As you had directed, FMC is providing a weekly report, pursuant to the RCRA Pond UAO, describing field activities conducted pursuant to work plans you have approved.

WEEKLY

Work Performed this week:

- Continue implementation of the Pond 15S RIWP and, following completion of the NW standpipe

project, gas extraction and treatment at Pond 15S, and beginning on 5/2/16, 80-hour per week operation of one GES unit extracting from the southwest standpipe, one GES unit extracting from the east standpipe and one GES unit extracting from the new northwest standpipe (for a total of five GES units operating at Pond 15S) on an 80-hour per week schedule.

PH3 sources gas concentrations for the past week:

- SW standpipe - 122 ppm
- NW standpipe - 65 ppm
- East standpipe - 65 ppm

- Pursuant to EPA's 4/25/16 email directing FMC to commence gas extraction and treatment at Pond 16S and the Pond 16S RIWP, began operation of one GES unit extracting from the north standpipe and one unit extracting on the east standpipe at Pond 16S on an 80-hour per week schedule on 5/2/16. Per FMC's verbal notification on 4/26/16 and EPA's 4/28/16 verbal concurrence, the two continuous monitoring stations at Pond 16S were relocated to positions in the prevailing downwind direction of the GES units that will be connected to the north and east standpipes prior to beginning gas extraction.

  During the he first week of operation, source gas concentrations averaged:

  - North standpipe - 8,803 ppm
  - East standpipe - 6,697 ppm

- Continued continuous monitoring at four 15S boundary monitoring locations and began monitoring at two boundary locations at Pond 16S during periods of gas extraction. There were no TWA or maximum values above the thresholds specified in the Air Monitoring Plan. A spreadsheet summarizing the results of this monitoring to date is attached.
- In addition to continuous monitoring, monitoring performed pursuant to the approved work plans:
  - Ponds 16S – Perimeter surface scan
- Submitted April data in monthly report on 5/4/16 and participated on monthly conference call on 5/5/16.

Problems Encountered:

None.

Unplanned Events Encountered:

When the operators arrived on-site on 5/6/16, the Pond 16S north standpipe GES unit blower was off. No auto-dialer alarms occurred during the evening to indicate a power outage or alarms occurred. The Pond 16S east GES blower was powered and running normally. Upon restarting the north standpipe GES unit, the carbon in the primary drum overheated. The carbon in the primary drum was changed out and the unit was re-started without issue. About 4 hours of operating time on the north standpipe GES unit was lost during this event.

Work to be performed the following week:

- Continue implementation of the Pond 15S RIWP and 80-hour per week operation of one GES unit extracting from the southwest standpipe, one GES unit extracting from the east standpipe and one GES unit extracting from the new northwest standpipe (for a total of five GES units operating at Pond 15S).
- Pursuant to EPA's 4/25/16 email directing FMC to commence gas extraction and treatment at Pond 16S and the Pond 16S RIWP, continue operation of one GES unit extracting from the north standpipe and one unit extracting on the east standpipe at Pond 16S on an 80-hour per week schedule on 5/2/16.
- Continue continuous monitoring at four 15S boundary monitoring locations and two Pond 16S boundary monitoring locations during periods of gas extraction.
- In addition to continuous monitoring, monitoring planned pursuant to the approved work plans:
  - Ponds 15S – Appurtenance and perimeter surface scan (weather / surface conditions permitting)
  - Pond 16S – Appurtenance monitoring
  - Pond 18A - Appurtenance and perimeter surface scan (weather / surface conditions permitting)
- Begin to compile information for Pond 15S NW Standpipe Replacement project construction completion report.